

# **EXHIBIT 5**



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Christina J. Moser, Esq.  
Baker Hostetler  
Key Tower, 127 Public Square  
Suite 2000  
Cleveland, OH 44114

**Re: *Drips Holdings, LLC v. Teledrip LLC***

Dear Christina,

Teledrip writes this letter to address deficiencies in your Responses to Teledrip's Third Set of Requests for Production. Teledrip vehemently objects to your mischaracterization of this Matter and your attempts to malign Teledrip in your responses. Your first general objection is ridiculously false and you have no evidence (because there is no evidence) that Teledrip has committed any tortious activity, let alone tried to conceal it.

Your answers to the following requests for production are deficient:

**Requests For Production 116-119 (Patent Documents):** Drips refusal to provide the requested documents regarding its patent is uncalled for. These documents are relevant because in its response to Teledrip's second set of interrogatories, Drips referenced its patent applications as showing, and describing the scope of, its trade secrets. The documents are also relevant because they may tend to show that the subject matter described and/or claimed in the patent applications is public knowledge or generally known in the industry. Teledrip is entitled to these documents, including the entire file wrapper for the patent applications, copies of all Office Actions mailed by the United States Patent Office along with copies of any documents cited therein as prior art made of record or used in rejection, copies of Drips' responses to any such Office Actions, and any Information Disclosure Statements filed by Drips along with copies of all references disclosed therein.

**Request For Production 120 (Patentability of Workflow):** Drips needs to provide documents responsive to this Request. These documents are relevant because they may tend to show that the subject matter described and/or claimed in the patent applications is public knowledge or generally known in the industry.

**Request For Production 33 (Individuals In the Amended Disclosures):** Teledrip objects to Drips' refusal to provide a privilege log of documents related to this Request. Provide the privilege log.

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**Request For Production 141 (Metadata of Workflow):** In response to this interrogatory, Drips provided a spreadsheet that it created showing the creation date and last modified date of various marketing documents. This response is not sufficient. Teledrip needs Drips to provide the copies of the marketing material *with metadata* so that it can see first hand when each piece of marketing material was created. This secondhand created-for-litigation spreadsheet is not original evidence of when marketing material was created. Drips was able to create the spreadsheet, so it obviously has this metadata. Provide the marketing material, with metadata, to Teledrip.

Regards,

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